

Memorandum

**Re: Final Emerging Issues Paper
General Aviation Infrastructure Funding Challenges**

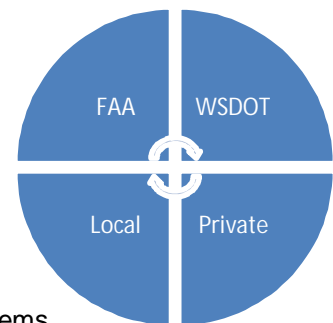
This technical memorandum summarizes general aviation (GA) infrastructure funding challenges and the impacts of these challenges on the State of Washington. It is important to recognize the significant efforts that have been undertaken related to infrastructure funding in recent years which are described below.

Introduction

Airports have significant funding needs to maintain existing infrastructure in a state of good repair as well as undergo facility improvements and expansions in order to better serve the aviation demands. These funding needs are on top of day-to-day operational requirements to keep the airport running. With constantly increasing costs and sometimes limited resources available to airports for capital infrastructure projects, airport owners and sponsors seek all available funding sources that offer both traditional and innovative solutions to funding challenges.

There are four traditional funding sources:

- Federal Aviation Administration (FAA)
- State agencies such as the Washington Department of Transportation (WSDOT)
- Local owners and sponsors such as cities, counties, and other political subdivisions
- Private

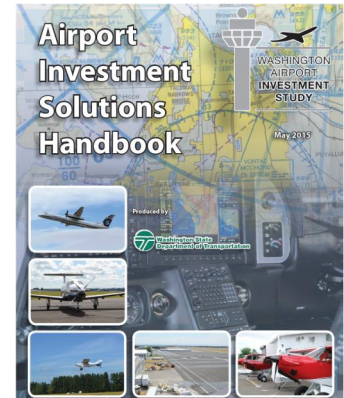


Airports that are included in the FAA's National Plan of Integrated Airport Systems (NPIAS) are eligible to receive federal funding for certain projects. In Washington State, funding is also provided to airports to assist with infrastructure needs, both to those airports that are included in the NPIAS and eligible for FAA funding as well as airports that do not receive federal funding. All airports require local resources to either match or outright fund infrastructure needs on their own. Many times private funding is used by the local owners and sponsors to supplement or partner with public funds to ensure a project's completion. Private sector funding can be used to develop projects such as hangars and other projects typically not eligible for other sources of funding but for which airport users have a need and revenue may be generated.

This paper focuses on the state and local challenges related to funding for airports, and discusses some potential solutions or strategies that could be considered to address the challenges. A primary source document for the identification of challenges and potential solutions is the [WSDOT Airport Investment Study](#) (also called Phase I, with the subsequent *Airport Investment Solutions Study* sometimes referred to as Phase II) including the Reference Guide produced for the project.

The *Airport Investment Study* was undertaken in 2014 by WSDOT to “understand historical federal and state funding levels, forecast likely future funds availability, identify the total statewide airport preservation and capital needs, and identify any potential gaps between forecast funding and needs.” The study’s 20-year estimate for statewide project needs at the 134 public-use airports was \$3.6 billion. While federal and local funding will be used to meet some of this need, based on the study projections, an average of \$12 million per year would be sought from the WSDOT Airport Aid Grant program to meet the projected requests. The 20-year average forecast for the WSDOT Airport Aid Program would likely only be able to provide approximately \$1.4 million per year, leaving a significant shortfall in the money required to sustain the necessary preservation and development of the state’s aviation system.

The *Airport Investment Solutions Study* focused on evaluation of potential solutions to the projected WSDOT Infrastructure challenges. The study identified thirty-three (33) preliminary solutions to address both funding and non-funding related implementation strategies. The solutions were categorized into the following: New Funding Sources; Refinements of Current Funding Programs; Revisions to Current Funding Sources; and Other Potential Solutions. The list below provides a complete list of the 33 solutions that were identified by category.



New Funding Sources (13 solutions)

- Alternative industry taxation Sources outside of aviation
- Utilize “Infrastructure Exchange” financing
- Corporate Sponsorships
- Public Private Partnerships (P3) project funding
- Establish a state passenger Facility Charge (PFC) head tax program
- Establish wide ranging state tax credits to airports
- Alternative taxing of airport operationally oriented uses
- Alternative taxing of on airport generated commercial activities
- Alternative taxing of the proportional value of transportation benefits derived
- Alternative economic development based consumption tax
- Establish a State sponsored revolving aviation infrastructure loan fund
- Establish a through the fence access fee structure
- Direct aviation administrative related fees

Refinements to Current Funding Programs (7 solutions)

- Realignment of current funding allocations
- Restructure the current State transportation and general funds
- Tiered airport aid funding
- Set self-sustaining fee requirements for airports receiving grant funding
- Reduce sales tax exemption for other construction
- State of Washington to petition to become an FAA block grant state
- Modify project screening and evaluation process to allow for more project eligibility

Revisions to Current Funding Sources (6 solutions)

- Increase existing aviation taxation rates
- Airport Leasehold taxes to go directly into the aeronautics account
- Revise Fuel Tax Exemptions
- Modify and Improve the State aircraft excise tax program
- Utilizing other state and federal grant funding sources
- Eliminate Aircraft Registration Exemptions and Add new Registration Source(s)

Aviation System Revisions/Airport Management Best Practices (7 solutions)

- Promote establishment of commissions/airport authorities
- Leverage USDOT paving contracts at airports
- De-Federalize State airports for construction contracts
- Improve aviation educational/marketing and outreach programs
- Right size airport infrastructure

- Develop a Management Best Practices toolkit for state airports
- Investigate FAA funding best practices by region

Of these 33 solutions, ten (10) core study solutions were identified and recommended for performance analyses. These 10 solutions were those that scored highest against a set of screening and evaluation criteria to help ensure the solutions are “feasible, acceptable, suitable, distinguishable and complete.” The 10 core solutions identified in the study are provided below. The solutions are not presented in any particular order. The following are the 10 core study solutions:

1. Public Private Partnerships (P3) – entails the full utilization of private sector funding for all types of revenue producing airport projects. This would involve the full range of P3 funding sources from full airport privatization to partial, facility-specific privatization;
2. Alternative Taxing of Airport Operationally Oriented Uses – state law that would allow for airport operational activities, such as licensed motor vehicles based at an airport, non-aviation fueling consumption, airport parking, and others, to be taxed or levied a fee, with proceeds going to the Aeronautics Account;
3. Alternative Economic Development Based Consumption Tax – would tie to existing local and statewide visitor based tax funding to leverage a share of tourist taxes;
4. Establish a State-Sponsored Revolving Aviation Infrastructure Loan Fund (SRF) – providing a pool of funds to initiate a low-rate loan fund that is applicable to either revenue funded or airport sponsor funded programs;
5. Realignment of Current Transportation Revenue Allocations – refines allocations of current State transportation-generated revenues with a direct nexus to the state aviation system to allow revenues to be reinvested to aviation capital needs in proportion to the benefit provided by aviation and air commerce;
6. Reallocate Airport Leasehold Tax to the Aeronautics Account – leasehold tax revenues would be routed to the State Aeronautics Account to fund aviation preservation and capital projects rather than being diverted to the General Fund;
7. Increase Select Aviation Tax Rates – increases in the current taxation program that goes into the State Aeronautics Account with a focus on taxes that currently support aviation and that would have a meaningful impact on the funding gap;
8. Revise Fuel Excise Tax Exemptions – reviewing and optimizing existing exemptions to create a more consistent aviation fuel excise tax base;
9. Modify the State Aircraft Excise Tax Program – revise the state excise tax program for aircraft by modifying legislation that established the current program and includes changing the Aeronautics Account revenue allocation from 10% to 100%; and
10. Develop a Best Management Practices (BMP) Guidebook/Toolkit for Airports – develop a tool kit mainly for non-self-sufficient GA airports that would help airports adopt the best practices that would better allow them to move towards self-sufficiency in their capital improvement programs.

Strategies for Implementing State Funding Solutions

The *Airport Investment Solutions Study* identified many possible solutions for providing infrastructure funding to Washington airports. All of the possible solutions will likely require coordination that starts with identification of a champion, which could be a group or a key individual that will take the lead in the efforts necessary for implementation. Most of the potential solutions require changes in state legislation or policies that will take political support for successful enactment. The list below identifies strategies that can be considered to support the implementation of some of these solutions:

- Support the continuation of the Advisory Committee membership from the *Airport Investment Solutions Study* or a similar group to continue the momentum developed during the study regarding the importance of finding state funding solutions to assist with the funding needs

- Solidify support from groups such as the Washington State Aviation Alliance (WSAA), Washington Pilots Association (WPA), the Washington Airport Management Association (WAMA), and/or the Washington State Community Airports Association (WSCAA) to help lobby the state legislature to vote in favor of legislation that supports one or more of the funding solutions
- Work with airport sponsors to identify aviation-supportive state legislators that could be requested to draft and support legislation for solutions that would benefit the airport system
- Build support from aviation-supportive officials to consider development of a task force or work group within the legislature to evaluate the top funding solutions, including consideration of fiscal analysis, that could be used to determine the potential solution that may receive the highest support in the full legislature

Non-Funding Solutions for Airport Infrastructure Funding Challenges

Recognizing that implementing a funding-based solution to address the infrastructure financial insufficiency will take time and considerable political will, and that some challenges can be met with solutions other than money, non-funding solutions were also considered. These solutions are largely dependent on changes to state policies and the state airport system's existing structure. Several of these solutions are discussed below.

Combining Multiple Airports under a Single Administration, Association, or Partnership

A possible non-funding solution to reduce costs to each individual airport sponsor, especially those small airports that have historically been unable to meet the financial requirements of continued capital investment or even ongoing maintenance, could be the implementation of regional airport system commissions or airport authorities or some other recognized organization. In some metropolitan areas that have several airports that support a region, consolidated governing agencies have been established that make funding and improvement decisions for the benefit of not just one airport, but for the benefit of the region as a whole. Examples of these regional commissions have been established in the following:

- Minneapolis (MN): Metropolitan Airports Commission with Minneapolis-St. Paul International Airport (commercial service) and six general aviation airports
- Nashville (TN): Metropolitan Nashville Airport Authority with Nashville International (commercial service) and John C. Tune (general aviation) Airports
- Brunswick (GA): Glynn County Airport Commission with Brunswick Golden Isles (commercial service) and McKinnon St. Simons Island (general aviation) airports

Other government entities such as counties or ports also have multiple airports under their jurisdiction that allows for sharing of resources and consideration of development across the system. The Port of Chelan County has both Pangborn Memorial Airport (also operated with Port of Douglas County) and Lake Chelan Airport, and Yavapai County (Arizona) has three general aviation airports under its control, Sedona, Bagdad, and Seligman. In addition to shared responsibility for Pangborn Memorial, the Port of Douglas County also has sole responsibility for the airports in Waterville and Mansfield.

Consolidation of roles and responsibilities often leads to greater efficiency of matters pertaining to airport governing, better prioritization of airport improvement projects, and provides an overall benefit to a region. The regional benefits and coordination of airport needs, contributions, and activities should be an integral part of regional planning efforts by the metropolitan planning organizations (MPOs) and regional transportation planning organizations (RTPOs), many of which are not aware of or engage with the airports within their jurisdictions. This first step of engagement in the regional planning efforts through coordination efforts could promote the concept of “operating groups” or entities for multiple airports as the activities and contributions of the airports are better understood.

Operating airports as a system would promote a more cohesive and standardized approach to oversight and management of the airports with the likelihood that the management functions would be maintained by a more experienced airport specialist. These specialists would understand the benefits of optimizing

various aviation activities such as redundant flight schools and facilities including duplicating hangar development and considering availability in a regional or system context.

The development of these partnerships would require inter-local or jurisdictional agreements or memoranda of understanding that detail the operational, financial, and legal aspects of the relationship. It would be important that these partnerships provide a “win-win” for the participating agencies. It is possible that associations such as WAMA and/or WSCAA could help to evaluate the opportunities and challenges of such an agreement.

Reducing Infrastructure Standards at Non-NPIAS Airports

For airports that are not included in the NPIAS, the FAA standards can present an unrealistic standard that is not achievable, nor required. At this time, WSDOT only has airport design standards for state-managed airports (as documented in the *State-Managed Airport Handbook* dated February 2011) and performance objectives (including specific facility objectives by airport classification) that were established as part of the LATS study. A potential solution may be to develop a set of standards independent from the FAA that provide reduced requirements and increased flexibility for airport infrastructure at non-NPIAS airports. This would help reduce the amount of investment needed at these airports for capital projects to meet current FAA standards.

Allowing Washington Airports to Opt-Out of State System

Under Washington law, “any city, county, airport authority, political subdivision, federally recognized Indian tribe, public corporation, or person(s) that owns and operates, a public-use airport included in the Washington Aviation System Plan (WASP) is considered an eligible airport sponsor and may apply for WSDOT Airport Aid grant funds.” The Washington state Aviation System currently includes all publicly owned airports and does not provide for an airport to “opt-out” of the system. While opting out would make the airport ineligible to receive WSDOT Airport Aid grant funds, it would also reduce the need to meet grant assurances that can have financial implications, especially to small airports and their local government and community. These include compatible land-use planning, public hearings, pavement maintenance, environmental compliance, operations and maintenance, and many others. The effect of airports opting out and not providing funding would reduce the overall capital needs in the system but the exact impact of this potential solution has not been quantified.

Local Funding Solutions and Challenges

As costs of operating and maintaining airports get higher but funding available through State Aid grants remains the same, airports have to look for supplemental sources of funding to support additional projects. Local revenue sources fall into three categories: funds received from local agencies or municipalities; funds generated by the airport; and funds received from private sector sources.

Funding from Local Agencies or Municipalities

Funding that is provided to a local airport by a jurisdiction usually comes from local tax revenues. The challenge with this source of funding is that it is not always a set or continuous funding stream. First, the amount of money available is not reliable and can vary based on factors like the local economy and demographics of its residents. Further, airports seeking local funding must often compete with other local projects or community interests.¹ Municipal councils or governments might choose to allocate funding to projects that are more visible in the community or that directly and noticeably affect a greater number of people than would a project at an airport. This is particularly true recently as it has been reported that many people are choosing to drive to larger airports in larger cities that might have more attractive services rather than using their smaller, local airports.² The benefits of airports and specifically projects are also not always recognizable, especially the less tangible qualitative benefits that are derived from an airport. WSDOT’s *Aviation Economic Impact Study (2012)* identified 17 aviation-related activities that are supported at the airports and through the *Airport Investment Study*, the impacts of the lack of investment in projects on the 17 activities was determined. The level of impacts to airport users were determined to

¹ Funding Airport Investments (2015), *Washington Airport Investment Study Reference Guide*, p. 67

² Dillingham, G.L. (2014), *Aviation Industry Changes Affect Airport Development Costs and Financing*, US Government Accountability Office. p.7

affect operations, capacity, and sustainability, with moderate to significant impacts to the communities that support and benefit from airports, including all citizens that are affected by the loss of economic and tax revenue “opportunity costs.”³

Revenues Generated by the Airport

Some airports have the ability to generate additional funding for capital projects internally through airport-specific fees and non-aeronautical revenues. One example of an airport-specific fee is passenger facility charges (PFCs) at commercial service airports. The FAA guidance on PFCs dictates that airports are allowed to collect fees up to \$4.50 per enplaned passenger at commercial airports that are operated by a public agency⁴. With these fees, airports can fund approved projects that enhance safety, security, or capacity or that improve the airport’s services or competitiveness in the aviation market. PFCs are an important source of revenue for larger, busier airports and can help provide the additional funding that is needed for critical projects not funded by the State Aid grants.

One challenge with PFCs is that they are only advantageous to airports with significant commercial service and a high number of enplanements. Airports with a small number of enplanements will get limited benefit from this additional fee because the number of passengers paying the \$4.50 fee will be less significant. Further, as discussed in the previous section on increased taxes and fees, when additional fees are imposed, the whole fee amount is borne by the consumer in the form of increased ticket prices. At smaller airports that may not be as competitive in the airline industry, increased ticket prices could result in reduced consumer demand and be further detrimental to the airport.

Other sources of revenue that can be generated by an airport include:

- Retail and dining services that can be provided to passengers inside of airport terminals or airport properties
- Hangar leases and other aircraft parking and storage fees
- Leasing of airport property for non-aviation uses

As part of the *Airport Investment Study*, the leasing of airport property for non-aviation development was a primary topic, with the need for some infrastructure to support this type of development. A specific recommendation to establish a State-Sponsored Revolving Aviation Infrastructure Loan Fund (SRF) would support the infrastructure needs to enhance and further enable development of these properties for potential revenue generation at airports.

Additional revenue in the form of dining or retail revenue has been very important for the success of larger airports throughout the country; however, as with PFCs, these additional sources of revenue are often only feasible for larger airports, especially those with commercial airline service. Airports with limited operations and airport users often do not have the customer base to support significant private retail or dining, beyond that which is provided purely for customer convenience and necessity, and would have difficulty attracting major vendors to their airport. Thus, options for generating internal revenues are limited for smaller commercial service and GA airports, which are airports that are often in the greatest need of additional funding.

Revenue generated by leasing hangars and aircraft storage space is a beneficial source of income for airports with significant GA operations. Both commercial service airports and GA airports can benefit from providing hangars or other storage for aircraft that are based at the airport. For some small commercial service and larger GA airports, this can be a significant source of revenue every year. However, the amount of revenue from hangar and aircraft parking or storage leases is based on the number of based aircraft at the airport; smaller airports that do not have as many based aircraft often lack demand for storage space and must charge a market-based or even lower rate. Further, without adequate funding for

³ Consequences of Perpetuating Current Funding (2015), *Washington Airport Investment Study Reference Guide*, p. 31

⁴ <http://www.faa.gov/airports/pfc/>

development of the airport, a smaller GA airport will not have the facilities or amenities to attract the number of based aircraft needed to make significant money from storage-related leases. Finally, airports can sometimes generate additional revenue by leasing out portions of airport property to be used for non-aviation uses such as agricultural or industrial/commercial uses. This allows airports to generate money on unused land and allows them to try and control the types of land uses surrounding the airport to make sure they are compatible with airport operations and local land use provisions. One challenge with this strategy is that leasing land on the airport could potentially constrain airport expansion in the future and is limited by the FAA through a requirement to obtain FAA approval through the ALP review process. Airports also have varying sizes of land envelopes and especially the amount of land that may be available for non-aviation related development, also affecting the amount of revenue that could be generated. Land leases on an airport for non-aviation related development are required to be fair market value. If there is land surrounding the airport available for development, the owner of that land has far fewer restrictions on the potential uses and fees than an airport, also inhibiting the ability of the airport to generate revenue with land that is not needed for aviation needs.

Another challenge with leasing land is the possibility of the development of incompatible uses surrounding an airport, which could constrain airport operations. There are guidelines regarding the types of uses that are compatible near an airport to ensure the safety of passengers as well as the surrounding populations. For example, there are height standards within an airport runway environment to minimize conflicts between aircraft and tall obstructions. For similar safety reasons, there is guidance on the density and type of land use development around an airport to ensure noise is not an issue.

Economic Impact of Airports in Washington and Nationally

It is critical to recognize that while the operation and maintenance of airports has a monetary cost, there are also substantial economic benefits that are created by airports and aviation-related activity. In 2012, WSDOT conducted an Aviation Economic Impact Study to understand the role that aviation plays in Washington's economy and demonstrate how the airport system and individual airports contribute to the well-being of the state and local communities. Through this study, it was found that the 135 public use airports in the Washington system resulted in 248,500 jobs, \$15.3 billion in wages and \$50.9 billion in total economic activity. Every year, more than \$701 million is generated in tax revenue from aviation activities with \$548 million of that used to support the State General Fund.

In addition to the significant economic impact that the aviation system has in Washington, airports also provide multiple social and quality of life benefits to the state and surrounding communities that are not quantifiable but that create significant, positive impacts.



Aviation Creates and Supports Employment and Businesses

Analyses conducted by organizations such as the National Business Aviation Association (NBAA) show that many businesses and sectors of the economy rely on aviation. NBAA found that businesses that have access to aviation are frequently more successful, both economically and institutionally, than those who do not have aviation as a resource. The use of an aircraft creates competitive marketplace advantages in the speed and efficiency of delivering employees, goods, and services that are essential for success. This is especially true for small and medium-sized businesses that are expanding into regional and national markets, but it is also applicable to larger companies that might have multiple locations and provide significant tax and retail revenue to the local jurisdiction and the state.

Aviation Supports Economic and Community Development

Airports and aviation in general also further support the economic and community development of jurisdictions. An airport's presence can make an area more attractive to businesses that are looking to locate there and can improve business investment in an area. Additionally, residents including permanent, part-time or seasonal can be drawn to a community because of the presence of an airport, both in the form of commercial service and general aviation. The availability of an airport also supports increased tourism, especially during special events that generate large numbers of visitors to an area. Many business and recreational visitors may choose to fly into a variety of available general aviation airports based on their proximity to their final destination or the ability to avoid the congestion at a commercial airport. Overall, an airport functions as a gateway into a city that helps attract visitors and businesses that might otherwise overlook or dismiss the area.

Aviation Supports Safety, Medical Services, and Emergency Preparedness and Response

Aviation facilities such as airports and heliports are important assets for emergency and medical personnel to help provide improved and expedited services to communities. Medical transport by airplanes and helicopters (air ambulance) at general aviation airports provides transportation for patients when a commercial service airport may not be nearby⁵, and airports can help provide medical services to communities that are not close to a population center. Similarly, airports provide a critical alternative facility to support emergency and disaster response. An airport can provide essential evacuation services or can be the staging area for disaster relief personnel and supplies in the case of a large-scale, disruptive event.

Aviation contributes to critical emergency and safety services for communities. An airport can provide law enforcement and national security with locations for police helicopter fleets and other agencies. These functions improve the safety and stability of the surrounding jurisdictions. Airports also facilitate search and rescue missions to help locate and rescue missing persons by hosting or supporting patrols, providing fuel or other supplies, or providing transportation to medical facilities. In the western US, aviation is an important resource for fighting forest fires, as aircraft can cover larger geographical areas. They can also assist in staging areas for water rescues that might be required for airports along the coast.

Finally, general aviation airports provide alternative facilities for flight diversions in case of unexpected emergencies or bad weather. Each airport in a given area provides pilots with an immediate alternative for an emergency landing, which is critical to reduce the number of potential aviation accidents.

Overall, airports have been identified as a critical component of the transportation system as well as the economic fiber of a region, contributing to the vitality of a community to support business, tourism, emergency access, and transportation.

Summary of Impacts on Washington Airport System and Recommended Actions

As airport funding resources become more limited and the need and costs for infrastructure continues to rise, securing funding for implementing various projects is a challenge for most airports. There are potential state funding solutions derived from taxes and fees. There are also non-funding opportunities proposed to support the airports and the infrastructure challenges and funding needs. In addition, local funding solutions are more airport-specific and are unique to each airport and its location. In all cases, there are some overarching challenges for implementing funding solutions.

The challenge that is most widespread is that of finding funding streams that can benefit smaller airports that don't provide commercial service. There are several examples discussed above where both state and local funding solutions only benefit larger airports that either have very high numbers of operations or that have commercial airline service. For example, collecting additional taxes and fees on passengers provides the most benefit to airports that have significant commercial activity. Similarly, implementing new revenue streams such as charging for parking or providing dining or retail services at an airport will only

⁵ FAA (2012). General Aviation Airports: A national Asset. Retrieved from: http://www.faa.gov/airports/planning_capacity/ga_study/media/2012AssetReport.pdf

be viable at large airports that can support these activities. This challenge creates a cyclical issue because without sufficient funding, smaller airports are unable to develop and improve infrastructure and services needed to support an increase in operations; yet, without the increased operations, the airport will continue to be at a disadvantage when it comes to sources of funding.

The other widespread challenge is associated with creating additional revenue by imposing new taxes or raising current taxes. There will have to be careful consideration when looking to raise taxes or impose new taxes.

Even with the challenges that have been identified, it is important to remember and consider the substantial economic benefits that are derived as a result of an airport's activity. Airports and aviation as a whole create and support employment and businesses throughout Washington, as well as economic and community development. Some of the benefits of aviation are easily quantifiable and have been evaluated, but there are also numerous social and quality of life benefits that are more qualitative and represent significant, positive impacts to the residents, businesses, and visitors to Washington.

As part of the WASP, WSDOT Aviation convened working groups to discuss aviation issues. A working group was established to discuss general aviation infrastructure funding challenges. This group recommended the following actions be considered:

RECOMMENDATION: WSDOT Aviation support small group discussion through associations such as WAMA and WSCAA to develop and evaluate the potential implementation of combining multiple airports under a single administration, association, or partnership. Discussion would outline opportunities and issues including voluntary participation, benefits, need for formal memorandum of agreement or understanding, funding, etc.

RECOMMENDATION: WSDOT Aviation should evaluate and consider a program related to reduced infrastructure standards for non-NPIAS airports. Options for this program could include:

- Vetting optimized infrastructure and safety standards
- Developing interim guidance to airports and requests/grants of temporary exemption from standards with an accompanying roadmap or plan for the requesting airport that outlines improvement goals with milestones and benchmarks
- Evaluating opportunities to voluntarily opt out of the aviation system, which could release an airport sponsor from any responsibility to meet state standards and include an accompanying release of eligibility for grants and loans from the state Airport Aid Program
- Examining the state airport classification to consider existing FAA classifications and specifically address airports that do not meet the FAA Basic level criteria, whether NPIAS or Non-NPIAS, to determine what adjustments may be appropriate to allow continued airport participation in the state aviation system with an adjusted set of requirements appropriate for smaller airports with lower aircraft density and operations
- Developing a minimum set of standards for participation in the state aviation system
- Developing a set of criteria for inclusion or opting-out of the aviation system, and for changing an airport's classification as airport characteristics and operation activities change